

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

**LIZELLE GONZALEZ**  
**Plaintiff**

**Vs.**

**GOCHA ALLEN RAMIREZ, et al.**  
**Defendants**

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**CIVIL ACTION 7:24-CV-00132**

**PLAINTIFF'S NOTICE OF INTENT TO TAKE THE  
ORAL AND VIDEOTAPED DEPOSITION OF RAFAEL AGUIRRE**

TO: Defendants, by and through their attorneys of record, Ricardo J. Navarro and Kelly R. Albin, DENTON NAVARRO RODRIGUEZ BERNAL SANTEE & ZECH, P.C., [rjnavarro@rampagelaw.com](mailto:rjnavarro@rampagelaw.com), [kralbin@rampagelaw.com](mailto:kralbin@rampagelaw.com)

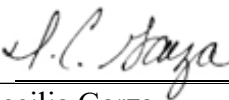
PLEASE TAKE NOTICE that Plaintiff will take the *in person* oral and videotaped deposition of RAFAEL AGUIRRE pursuant to Rule 30 of the Federal Rules of Civil Procedure before certified shorthand reporters, Esquire Deposition Solutions, as follows:

**Date: January 13, 2025**  
**Time: 9:00 a.m.**  
**Location: Esquire Deposition Solutions**  
**7000 N. 10<sup>th</sup> Street, Ste. C2-B**  
**McAllen, Texas 78504**

Said deposition will begin at 9:00 a.m. and continue thereafter from day to day until completed. All other parties are hereby invited to attend and cross-examine the deponent. Said deposition may be videotaped in addition to the customary stenographic recording.

*Signature Page to Follow*

Respectfully Submitted,

By:   
I. Cecilia Garza  
State Bar No. 24041627  
Federal Admission No.: 578825  
202 E. Sprague Street  
Edinburg, Texas 78539  
Telephone No.: 956/335-4900  
Telecopier No.: 956/338-5700  
[cecilia@garzamartinezlaw.com](mailto:cecilia@garzamartinezlaw.com)  
*Attorney in charge for Plaintiff*

Veronica Sepulveda Martinez  
State Bar No. 24081144  
Federal Admission No.: 3048499  
202 E. Sprague Street  
Edinburg, Texas 78539  
Telephone No.: 956/335-4900  
Telecopier No.: 956/338-5700  
[veronica@garzamartinezlaw.com](mailto:veronica@garzamartinezlaw.com)

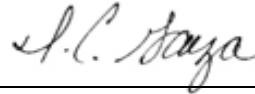
Lauren Alicia Johnson  
American Civil Liberties Union Foundation  
915 15th Street NW  
Washington DC 20005  
Telephone No.: (202) 731-5567  
[ljohnson@aclu.org](mailto:ljohnson@aclu.org)

David A. Donatti (Bar No. 24097612)  
Adriana Piñon (Bar No. 24089768)  
American Civil Liberties Union of Texas  
P.O. Box 12905  
Austin, TX 78711-2905  
Telephone No.: (713) 942-8146  
Facsimile: (713) 942-8966  
[ddonatti@aclutx.org](mailto:ddonatti@aclutx.org)  
[apinon@aclutx.org](mailto:apinon@aclutx.org)

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this notice was served in accordance with the Federal Rules of Civil Procedure by e-mail to all registered ECF users appearing in the case on January 8, 2025.

A handwritten signature in cursive script, appearing to read "I. Cecilia Garza", is written above a horizontal line.

I. Cecilia Garza

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

**LIZELLE GONZALEZ**  
**Plaintiff**

**Vs.**

**GOCHA ALLEN RAMIREZ, et al.**  
**Defendants**

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**CIVIL ACTION 7:24-CV-00132**

**PLAINTIFF'S NOTICE OF INTENT TO TAKE THE  
ORAL AND VIDEOTAPED DEPOSITION OF ESMERALDA NAVARRO MUNIZ**

TO: Defendants, by and through their attorneys of record, Ricardo J. Navarro and Kelly R. Albin, DENTON NAVARRO RODRIGUEZ BERNAL SANTEE & ZECH, P.C., [rjnavarro@rampagelaw.com](mailto:rjnavarro@rampagelaw.com), [kralbin@rampagelaw.com](mailto:kralbin@rampagelaw.com)

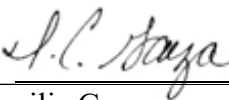
PLEASE TAKE NOTICE that Plaintiff will take the *in person* oral and videotaped deposition of ESMERALDA NAVARRO MUNIZ pursuant to Rule 30 of the Federal Rules of Civil Procedure before certified shorthand reporters, Esquire Deposition Solutions, as follows:

**Date: January 13, 2025**  
**Time: 11:00 a.m.**  
**Location: Esquire Deposition Solutions**  
**7000 N. 10<sup>th</sup> Street, Ste. C2-B**  
**McAllen, Texas 78504**

Said deposition will begin at 11:00 a.m. and continue thereafter from day to day until completed. All other parties are hereby invited to attend and cross-examine the deponent. Said deposition may be videotaped in addition to the customary stenographic recording.

*Signature Page to Follow*

Respectfully Submitted,

By:   
I. Cecilia Garza  
State Bar No. 24041627  
Federal Admission No.: 578825  
202 E. Sprague Street  
Edinburg, Texas 78539  
Telephone No.: 956/335-4900  
Telecopier No.: 956/338-5700  
[cecilia@garzamartinezlaw.com](mailto:cecilia@garzamartinezlaw.com)  
*Attorney in charge for Plaintiff*

Veronica Sepulveda Martinez  
State Bar No. 24081144  
Federal Admission No.: 3048499  
202 E. Sprague Street  
Edinburg, Texas 78539  
Telephone No.: 956/335-4900  
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[veronica@garzamartinezlaw.com](mailto:veronica@garzamartinezlaw.com)

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American Civil Liberties Union Foundation  
915 15th Street NW  
Washington DC 20005  
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[ljohnson@aclu.org](mailto:ljohnson@aclu.org)

David A. Donatti (Bar No. 24097612)  
Adriana Piñon (Bar No. 24089768)  
American Civil Liberties Union of Texas  
P.O. Box 12905  
Austin, TX 78711-2905  
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[ddonatti@aclutx.org](mailto:ddonatti@aclutx.org)  
[apinon@aclutx.org](mailto:apinon@aclutx.org)

**ATTORNEYS FOR PLAINTIFF**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

**LIZELLE GONZALEZ**  
**Plaintiff**

**Vs.**

**GOCHA ALLEN RAMIREZ, et al.**  
**Defendants**

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**CIVIL ACTION 7:24-CV-00132**

**PLAINTIFF'S NOTICE OF INTENT TO TAKE THE  
ORAL AND VIDEOTAPED DEPOSITION OF CARLOS DELGADO**

TO: Defendants, by and through their attorneys of record, Ricardo J. Navarro and Kelly R. Albin, DENTON NAVARRO RODRIGUEZ BERNAL SANTEE & ZECH, P.C., [rjnavarro@rampagelaw.com](mailto:rjnavarro@rampagelaw.com), [kralbin@rampagelaw.com](mailto:kralbin@rampagelaw.com)

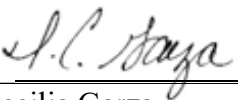
PLEASE TAKE NOTICE that Plaintiff will take the *in person* oral and videotaped deposition of CARLOS DELGADO pursuant to Rule 30 of the Federal Rules of Civil Procedure before certified shorthand reporters, Esquire Deposition Solutions, as follows:

**Date: January 13, 2025**  
**Time: 2:00 p.m.**  
**Location: Esquire Deposition Solutions**  
**7000 N. 10<sup>th</sup> Street, Ste. C2-B**  
**McAllen, Texas 78504**

Said deposition will begin at 2:00 p.m. and continue thereafter from day to day until completed. All other parties are hereby invited to attend and cross-examine the deponent. Said deposition may be videotaped in addition to the customary stenographic recording.

*Signature Page to Follow*

Respectfully Submitted,

By:   
I. Cecilia Garza  
State Bar No. 24041627  
Federal Admission No.: 578825  
202 E. Sprague Street  
Edinburg, Texas 78539  
Telephone No.: 956/335-4900  
Telecopier No.: 956/338-5700  
[cecilia@garzamartinezlaw.com](mailto:cecilia@garzamartinezlaw.com)  
*Attorney in charge for Plaintiff*

Veronica Sepulveda Martinez  
State Bar No. 24081144  
Federal Admission No.: 3048499  
202 E. Sprague Street  
Edinburg, Texas 78539  
Telephone No.: 956/335-4900  
Telecopier No.: 956/338-5700  
[veronica@garzamartinezlaw.com](mailto:veronica@garzamartinezlaw.com)

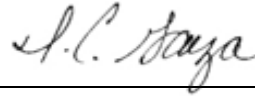
Lauren Alicia Johnson  
American Civil Liberties Union Foundation  
915 15th Street NW  
Washington DC 20005  
Telephone No.: (202) 731-5567  
[ljohnson@aclu.org](mailto:ljohnson@aclu.org)

David A. Donatti (Bar No. 24097612)  
Adriana Piñon (Bar No. 24089768)  
American Civil Liberties Union of Texas  
P.O. Box 12905  
Austin, TX 78711-2905  
Telephone No.: (713) 942-8146  
Facsimile: (713) 942-8966  
[ddonatti@aclutx.org](mailto:ddonatti@aclutx.org)  
[apinon@aclutx.org](mailto:apinon@aclutx.org)

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this notice was served in accordance with the Federal Rules of Civil Procedure by e-mail to all registered ECF users appearing in the case on January 8, 2025.

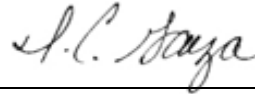
A handwritten signature in cursive script, appearing to read "I. Cecilia Garza", is positioned above a horizontal line.

I. Cecilia Garza



**CERTIFICATE OF SERVICE**

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I. Cecilia Garza

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

**LIZELLE GONZALEZ**  
**Plaintiff**

**Vs.**

**GOCHA ALLEN RAMIREZ, et al.**  
**Defendants**

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**CIVIL ACTION 7:24-CV-00132**

**PLAINTIFF'S NOTICE OF INTENT TO TAKE THE  
ORAL AND VIDEOTAPED DEPOSITION OF RODOLFO LOZANO, M.D.**

TO: Defendants, by and through their attorneys of record, Ricardo J. Navarro and Kelly R. Albin, DENTON NAVARRO RODRIGUEZ BERNAL SANTEE & ZECH, P.C., [rjnavarro@rampagelaw.com](mailto:rjnavarro@rampagelaw.com), [kralbin@rampagelaw.com](mailto:kralbin@rampagelaw.com)

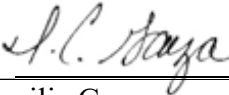
PLEASE TAKE NOTICE that Plaintiff will take the *in person* oral and videotaped deposition of RODOLFO LOZANO, M.D. pursuant to Rule 30 of the Federal Rules of Civil Procedure before certified shorthand reporters, Esquire Deposition Solutions, as follows:

**Date: January 14, 2025**  
**Time: 9:00 a.m.**  
**Location: Esquire Deposition Solutions**  
**7000 N. 10<sup>th</sup> Street, Ste. C2-B**  
**McAllen, Texas 78504**

Said deposition will begin at 9:00 a.m. and continue thereafter from day to day until completed. All other parties are hereby invited to attend and cross-examine the deponent. Said deposition may be videotaped in addition to the customary stenographic recording.

*Signature Page to Follow*

Respectfully Submitted,

By:   
I. Cecilia Garza  
State Bar No. 24041627  
Federal Admission No.: 578825  
202 E. Sprague Street  
Edinburg, Texas 78539  
Telephone No.: 956/335-4900  
Telecopier No.: 956/338-5700  
[cecilia@garzamartinezlaw.com](mailto:cecilia@garzamartinezlaw.com)  
*Attorney in charge for Plaintiff*

Veronica Sepulveda Martinez  
State Bar No. 24081144  
Federal Admission No.: 3048499  
202 E. Sprague Street  
Edinburg, Texas 78539  
Telephone No.: 956/335-4900  
Telecopier No.: 956/338-5700  
[veronica@garzamartinezlaw.com](mailto:veronica@garzamartinezlaw.com)

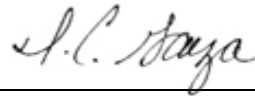
Lauren Alicia Johnson  
American Civil Liberties Union Foundation  
915 15th Street NW  
Washington DC 20005  
Telephone No.: (202) 731-5567  
[ljohnson@aclu.org](mailto:ljohnson@aclu.org)

David A. Donatti (Bar No. 24097612)  
Adriana Piñon (Bar No. 24089768)  
American Civil Liberties Union of Texas  
P.O. Box 12905  
Austin, TX 78711-2905  
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[ddonatti@aclutx.org](mailto:ddonatti@aclutx.org)  
[apinon@aclutx.org](mailto:apinon@aclutx.org)

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

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I. Cecilia Garza

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

**LIZELLE GONZALEZ**  
**Plaintiff**

**Vs.**

**GOCHA ALLEN RAMIREZ, et al.**  
**Defendants**

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**CIVIL ACTION 7:24-CV-00132**

**PLAINTIFF'S NOTICE OF INTENT TO TAKE THE  
ORAL AND VIDEOTAPED DEPOSITION OF MARTHA TORRES**

TO: Defendants, by and through their attorneys of record, Ricardo J. Navarro and Kelly R. Albin, DENTON NAVARRO RODRIGUEZ BERNAL SANTEE & ZECH, P.C., [rjnavarro@rampagelaw.com](mailto:rjnavarro@rampagelaw.com), [kralbin@rampagelaw.com](mailto:kralbin@rampagelaw.com)

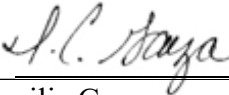
PLEASE TAKE NOTICE that Plaintiff will take the *in person* oral and videotaped deposition of MARTHA TORRES pursuant to Rule 30 of the Federal Rules of Civil Procedure before certified shorthand reporters, Esquire Deposition Solutions, as follows:

**Date: January 14, 2025**  
**Time: 11:00 a.m.**  
**Location: Esquire Deposition Solutions**  
**7000 N. 10<sup>th</sup> Street, Ste. C2-B**  
**McAllen, Texas 78504**

Said deposition will begin at 11:00 a.m. and continue thereafter from day to day until completed. All other parties are hereby invited to attend and cross-examine the deponent. Said deposition may be videotaped in addition to the customary stenographic recording.

*Signature Page to Follow*

Respectfully Submitted,

By:   
I. Cecilia Garza  
State Bar No. 24041627  
Federal Admission No.: 578825  
202 E. Sprague Street  
Edinburg, Texas 78539  
Telephone No.: 956/335-4900  
Telecopier No.: 956/338-5700  
[cecilia@garzamartinezlaw.com](mailto:cecilia@garzamartinezlaw.com)  
*Attorney in charge for Plaintiff*

Veronica Sepulveda Martinez  
State Bar No. 24081144  
Federal Admission No.: 3048499  
202 E. Sprague Street  
Edinburg, Texas 78539  
Telephone No.: 956/335-4900  
Telecopier No.: 956/338-5700  
[veronica@garzamartinezlaw.com](mailto:veronica@garzamartinezlaw.com)

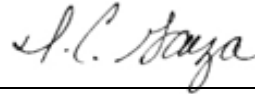
Lauren Alicia Johnson  
American Civil Liberties Union Foundation  
915 15th Street NW  
Washington DC 20005  
Telephone No.: (202) 731-5567  
[ljohnson@aclu.org](mailto:ljohnson@aclu.org)

David A. Donatti (Bar No. 24097612)  
Adriana Piñon (Bar No. 24089768)  
American Civil Liberties Union of Texas  
P.O. Box 12905  
Austin, TX 78711-2905  
Telephone No.: (713) 942-8146  
Facsimile: (713) 942-8966  
[ddonatti@aclutx.org](mailto:ddonatti@aclutx.org)  
[apinon@aclutx.org](mailto:apinon@aclutx.org)

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this notice was served in accordance with the Federal Rules of Civil Procedure by e-mail to all registered ECF users appearing in the case on January 8, 2025.

A handwritten signature in cursive script, appearing to read "I. Cecilia Garza", is written above a horizontal line.

I. Cecilia Garza

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

**LIZELLE GONZALEZ**  
**Plaintiff**

**Vs.**

**GOCHA ALLEN RAMIREZ, et al.**  
**Defendants**

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**CIVIL ACTION 7:24-CV-00132**

**PLAINTIFF'S NOTICE OF INTENT TO TAKE THE  
ORAL AND VIDEOTAPED DEPOSITION OF JUDITH SOLIS**

TO: Defendants, by and through their attorneys of record, Ricardo J. Navarro and Kelly R. Albin, DENTON NAVARRO RODRIGUEZ BERNAL SANTEE & ZECH, P.C., [rjnavarro@rampagelaw.com](mailto:rjnavarro@rampagelaw.com), [kralbin@rampagelaw.com](mailto:kralbin@rampagelaw.com)

PLEASE TAKE NOTICE that Plaintiff will take the *in person* oral and videotaped deposition of JUDITH SOLIS pursuant to Rule 30 of the Federal Rules of Civil Procedure before certified shorthand reporters, Esquire Deposition Solutions, as follows:

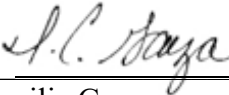
**Date: January 14, 2025**  
**Time: 2:00 p.m.**  
**Location: Esquire Deposition Solutions**  
**7000 N. 10<sup>th</sup> Street, Ste. C2-B**  
**McAllen, Texas 78504**

Said deposition will begin at 2:00 p.m. and continue thereafter from day to day until completed. All other parties are hereby invited to attend and cross-examine the deponent. Said deposition may be videotaped in addition to the customary stenographic recording.

*Signature Page to Follow*



Respectfully Submitted,

By:   
I. Cecilia Garza  
State Bar No. 24041627  
Federal Admission No.: 578825  
202 E. Sprague Street  
Edinburg, Texas 78539  
Telephone No.: 956/335-4900  
Telecopier No.: 956/338-5700  
[cecilia@garzamartinezlaw.com](mailto:cecilia@garzamartinezlaw.com)  
*Attorney in charge for Plaintiff*

Veronica Sepulveda Martinez  
State Bar No. 24081144  
Federal Admission No.: 3048499  
202 E. Sprague Street  
Edinburg, Texas 78539  
Telephone No.: 956/335-4900  
Telecopier No.: 956/338-5700  
[veronica@garzamartinezlaw.com](mailto:veronica@garzamartinezlaw.com)

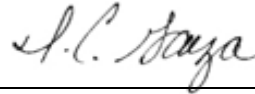
Lauren Alicia Johnson  
American Civil Liberties Union Foundation  
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Washington DC 20005  
Telephone No.: (202) 731-5567  
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David A. Donatti (Bar No. 24097612)  
Adriana Piñon (Bar No. 24089768)  
American Civil Liberties Union of Texas  
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[ddonatti@aclutx.org](mailto:ddonatti@aclutx.org)  
[apinon@aclutx.org](mailto:apinon@aclutx.org)

**ATTORNEYS FOR PLAINTIFF**

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I. Cecilia Garza

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

**LIZELLE GONZALEZ**  
**Plaintiff**

**Vs.**

**GOCHA ALLEN RAMIREZ, et al.**  
**Defendants**

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**CIVIL ACTION 7:24-CV-00132**

**PLAINTIFF'S NOTICE OF INTENT TO TAKE THE  
ORAL AND VIDEOTAPED DEPOSITION OF ABEL VILLARREAL, JR.**

TO: Defendants, by and through their attorneys of record, Ricardo J. Navarro and Kelly R. Albin, DENTON NAVARRO RODRIGUEZ BERNAL SANTEE & ZECH, P.C., [rjnavarro@rampagelaw.com](mailto:rjnavarro@rampagelaw.com), [kralbin@rampagelaw.com](mailto:kralbin@rampagelaw.com)

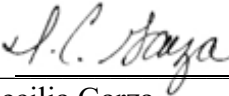
PLEASE TAKE NOTICE that Plaintiff will take the *in person* oral and videotaped deposition of ABEL VILLARREAL, JR. pursuant to Rule 30 of the Federal Rules of Civil Procedure before certified shorthand reporters, Esquire Deposition Solutions, as follows:

**Date: January 15, 2025**  
**Time: 9:00 a.m.**  
**Location: Garza Martinez, PLLC**  
**202 E. Sprague Street**  
**Edinburg, Texas 78539**

Said deposition will begin at 9:00 a.m. and continue thereafter from day to day until completed. All other parties are hereby invited to attend and cross-examine the deponent. Said deposition may be videotaped in addition to the customary stenographic recording.

*Signature Page to Follow*

Respectfully Submitted,

By:   
I. Cecilia Garza  
State Bar No. 24041627  
Federal Admission No.: 578825  
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[cecilia@garzamartinezlaw.com](mailto:cecilia@garzamartinezlaw.com)  
*Attorney in charge for Plaintiff*

Veronica Sepulveda Martinez  
State Bar No. 24081144  
Federal Admission No.: 3048499  
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[veronica@garzamartinezlaw.com](mailto:veronica@garzamartinezlaw.com)

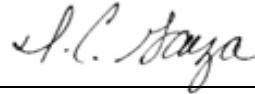
Lauren Alicia Johnson  
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915 15th Street NW  
Washington DC 20005  
Telephone No.: (202) 731-5567  
[ljohnson@aclu.org](mailto:ljohnson@aclu.org)

David A. Donatti (Bar No. 24097612)  
Adriana Piñon (Bar No. 24089768)  
American Civil Liberties Union of Texas  
P.O. Box 12905  
Austin, TX 78711-2905  
Telephone No.: (713) 942-8146  
Facsimile: (713) 942-8966  
[ddonatti@aclutx.org](mailto:ddonatti@aclutx.org)  
[apinon@aclutx.org](mailto:apinon@aclutx.org)

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this notice was served in accordance with the Federal Rules of Civil Procedure by e-mail to all registered ECF users appearing in the case on January 8, 2025.

A handwritten signature in cursive script, appearing to read "I. Cecilia Garza", is written above a horizontal line.

I. Cecilia Garza

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

**LIZELLE GONZALEZ**  
**Plaintiff**

**Vs.**

**GOCHA ALLEN RAMIREZ, et al.**  
**Defendants**

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**CIVIL ACTION 7:24-CV-00132**

**PLAINTIFF'S NOTICE OF INTENT TO TAKE THE  
ORAL AND VIDEOTAPED DEPOSITION OF DEFENDANT RENE FUENTES**

TO: Defendants, by and through their attorneys of record, Ricardo J. Navarro and Kelly R. Albin, DENTON NAVARRO RODRIGUEZ BERNAL SANTEE & ZECH, P.C., [rjnavarro@rampagelaw.com](mailto:rjnavarro@rampagelaw.com), [kralbin@rampagelaw.com](mailto:kralbin@rampagelaw.com)

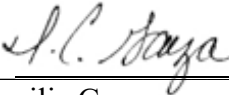
PLEASE TAKE NOTICE that Plaintiff will take the *in person* oral and videotaped deposition of Defendant RENE FUENTES pursuant to Rule 30 of the Federal Rules of Civil Procedure before certified shorthand reporters, Esquire Deposition Solutions, as follows:

**Date: January 15, 2025**  
**Time: 1:00 p.m.**  
**Location: Garza Martinez, PLLC**  
**202 E. Sprague Street**  
**Edinburg, Texas 78539**

Said deposition will begin at 1:00 p.m. and continue thereafter from day to day until completed. All other parties are hereby invited to attend and cross-examine the deponent. Said deposition may be videotaped in addition to the customary stenographic recording.

*Signature Page to Follow*

Respectfully Submitted,

By:   
I. Cecilia Garza  
State Bar No. 24041627  
Federal Admission No.: 578825  
202 E. Sprague Street  
Edinburg, Texas 78539  
Telephone No.: 956/335-4900  
Telecopier No.: 956/338-5700  
[cecilia@garzamartinezlaw.com](mailto:cecilia@garzamartinezlaw.com)  
*Attorney in charge for Plaintiff*

Veronica Sepulveda Martinez  
State Bar No. 24081144  
Federal Admission No.: 3048499  
202 E. Sprague Street  
Edinburg, Texas 78539  
Telephone No.: 956/335-4900  
Telecopier No.: 956/338-5700  
[veronica@garzamartinezlaw.com](mailto:veronica@garzamartinezlaw.com)

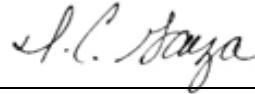
Lauren Alicia Johnson  
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I. Cecilia Garza



**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

**LIZELLE GONZALEZ**  
**Plaintiff**

**Vs.**

**GOCHA ALLEN RAMIREZ, et al.**  
**Defendants**

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**CIVIL ACTION 7:24-CV-00132**

**PLAINTIFF'S NOTICE OF INTENT TO TAKE THE  
ORAL AND VIDEOTAPED DEPOSITION OF DEFENDANT ALEXANDRIA BARRERA**

TO: Defendants, by and through their attorneys of record, Ricardo J. Navarro and Kelly R. Albin, DENTON NAVARRO RODRIGUEZ BERNAL SANTEE & ZECH, P.C., [rjnavarro@rampagelaw.com](mailto:rjnavarro@rampagelaw.com), [kralbin@rampagelaw.com](mailto:kralbin@rampagelaw.com)

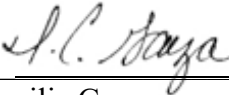
PLEASE TAKE NOTICE that Plaintiff will take the *in person* oral and videotaped deposition of Defendant ALEXANDRIA BARRERA pursuant to Rule 30 of the Federal Rules of Civil Procedure before certified shorthand reporters, Esquire Deposition Solutions, as follows:

**Date: January 16, 2025**  
**Time: 9:00 a.m.**  
**Location: Esquire Deposition Solutions**  
**7000 N. 10<sup>th</sup> Street, Ste. C2-B**  
**McAllen, Texas 78504**

Said deposition will begin at 9:00 a.m. and continue thereafter from day to day until completed. All other parties are hereby invited to attend and cross-examine the deponent. Said deposition may be videotaped in addition to the customary stenographic recording.

*Signature Page to Follow*

Respectfully Submitted,

By:   
I. Cecilia Garza  
State Bar No. 24041627  
Federal Admission No.: 578825  
202 E. Sprague Street  
Edinburg, Texas 78539  
Telephone No.: 956/335-4900  
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[cecilia@garzamartinezlaw.com](mailto:cecilia@garzamartinezlaw.com)  
*Attorney in charge for Plaintiff*

Veronica Sepulveda Martinez  
State Bar No. 24081144  
Federal Admission No.: 3048499  
202 E. Sprague Street  
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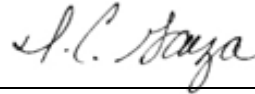
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I. Cecilia Garza

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

**LIZELLE GONZALEZ**  
**Plaintiff**

**Vs.**

**GOCHA ALLEN RAMIREZ, et al.**  
**Defendants**

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**CIVIL ACTION 7:24-CV-00132**

**PLAINTIFF'S NOTICE OF INTENT TO TAKE THE  
ORAL AND VIDEOTAPED DEPOSITION OF DEFENDANT G. ALLEN RAMIREZ**

TO: Defendants, by and through their attorneys of record, Ricardo J. Navarro and Kelly R. Albin, DENTON NAVARRO RODRIGUEZ BERNAL SANTEE & ZECH, P.C., [rjnavarro@rampagelaw.com](mailto:rjnavarro@rampagelaw.com), [kralbin@rampagelaw.com](mailto:kralbin@rampagelaw.com)

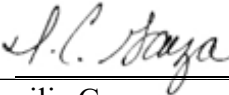
PLEASE TAKE NOTICE that Plaintiff will take the *in person* oral and videotaped deposition of Defendant G. ALLEN RAMIREZ pursuant to Rule 30 of the Federal Rules of Civil Procedure before certified shorthand reporters, Esquire Deposition Solutions, as follows:

**Date: January 17, 2025**  
**Time: 9:00 a.m.**  
**Location: Esquire Deposition Solutions**  
**7000 N. 10<sup>th</sup> Street, Ste. C2-B**  
**McAllen, Texas 78504**

Said deposition will begin at 9:00 a.m. and continue thereafter from day to day until completed. All other parties are hereby invited to attend and cross-examine the deponent. Said deposition may be videotaped in addition to the customary stenographic recording.

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Federal Admission No.: 578825  
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*Attorney in charge for Plaintiff*

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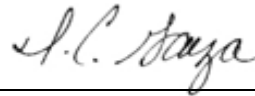
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